

## **City of Rockford, Illinois: Community-Wide Petroleum Assessment Grant Application**

### **1. Community Need**

#### **a. Targeted Community and Brownfields**

##### **i. Targeted Community Description**

The City of Rockford, Illinois, a city of 152,871, (2010 Census) was once a thriving manufacturing community, but has since faced decades of economic decline. Rockford was founded in 1837 and forms the central City in the Rockford Illinois Metropolitan Statistical Area. Early settlement and industry took place along the Rock River south of the current Downtown; with the industry using water power for the industrial processing that took place. This area, known as the Water Power District, was served shortly thereafter by the first railroad in the Rockford area which is now part the Union Pacific Railroad system. Two additional railroads later served this Water Power District, and industry spread west and south from the Water Power District railroad confluence to the South Main Rail Yards area, JI Case complex, the Barber Colman complex and beyond. Industrial development also spread along each rail line as it entered and left this rail confluence, resulting in a very complex pattern of industrial development along the rail lines that started during the 1850's and continued for approximately 100 years until modern industrial parks served by major highways began to dominate industrial development patterns. Generally speaking, in areas where two or more parallel rail lines served an area, there was usually an industrial concentration or industrial cluster. Each rail line usually followed a stream valley along part of its course through the area, an important Brownfield consideration. Interspersed with the industrial areas were the walk to work residential areas.

The construction of Interstates 90 due east of the City during the 1950's as well as the US 20 Bypass due south of the City during the 1960s resulted in a dramatic shift of industrial development away from the central areas and out to the industrial parks along these highways. These shifts in industrial activity and the jobs that go with this shift have all dealt serious blows to the vitality and viability of industry located in confined spaces along the rail corridors and the nearby residential areas. Many of these once-thriving industries are now vacant or underutilized and are often overlooked by the development community because of site constraints and perceived or known environmental contamination. Nearby residential areas are no longer located near the industrial jobs, and, instead are located near Brownfields. This dramatic shift in industrial location towards the outlying highway system was also a major contributor to the shift in gasoline stations from the older, narrow commercial corridors, including Downtown, to the modern highway system and the newer commercial corridors. Desktop Phase I Environmental Site Assessments have identified nearly 100 former gas station sites within a one mile radius of the center of Downtown Rockford, 53 former gas station sites on West State Street which had been US 20 until the Bypass was built in 1966. Similar numbers of former gas station sites can be found at other older commercial corridors such as the Illinois 251 corridor (formerly US 51), Kilburn Avenue (Illinois 70, a minor state route that is only 25 miles in length) and other local streets that are old commercial areas such as Broadway and Seventh Street. Commercial area blight is commonly found in these older commercial corridors as the factories nearby have been closed and have become Brownfields. According to the Economic Development District of Northern Illinois, in the Rockford Metropolitan Statistical Area manufacturing employment went from 48,600 in 1990 to 31,700 in 2014, a 35% decrease. In the Rockford MSA, manufacturing accounted for 35% of all jobs in 1990. In 2014, this figure had fallen to 21%.

Although this is a community-wide grant application, this Brownfield effort is targeted for the areas of the City most impacted by blighted commercial corridors with a large number of former gas station sites which are frequently blighted Brownfields. The Targeted Community for this Petroleum Assessment Grant is a 12 Census Tract area located west, south and east of Rockford's Downtown

and including Downtown. These Census Tracts are the most impacted by these blighted commercial areas. This twelve Census Tract area, Census Tracts 10-13, 21, 25-29 and 31-32 will be referred to as the Targeted Community for this Petroleum Grant Application. The Targeted Community includes the areas generally referred to as the “Southwest Side”, the “West Side” and the “South Side” of Rockford. The Targeted Community includes over 30 “Neighborhoods”. (Neighborhood Network). It is important to note the decline in industry in and near the Targeted Community contributed strongly to the economic disinvestment and resulting decline of the neighborhoods themselves as well as the nearby commercial areas.

Located within the Targeted Community are seven Petroleum Brownfield Corridors. Each of these seven Petroleum Brownfield (PB) Corridors has a severe impact on the adjacent neighborhoods comprising the Targeted Community. Once thriving areas with hundreds of workers and nearby business districts serving these workers, these 7 PB Corridors are each detrimental to the nearby neighborhoods. Over time the Targeted Community has experienced a major decline in population and increasing levels of poverty and crime largely due to the lack of employment opportunities in the immediate area. Environmental Assessment, Cleanup and Redevelopment of these Brownfields into facilities that provide jobs, services or other assets for the Targeted Community is imperative.

## ii. Demographic Information

	<b>Target Community (12 Census Tracts)</b>	<b>Rockford</b>	<b>Illinois</b>	<b>National</b>
Population:	32,062	152,138	12,848,554	311,536,594 <sup>1</sup>
Unemployment:	20.0%	8.3%	5.3%	4.8% <sup>2</sup>
Poverty Rate:	49.8%	25.5%	14.1%	11.3% <sup>1</sup>
Percent Minority:	73.1%	43.2%	33.6%	36.7% <sup>1</sup>
Per Capita Income:	\$10,943	\$21,570	\$29,666	\$ 28,155 <sup>1</sup>
Never Finished HS	29.67%	17.47%	12.7%	14.0% <sup>1</sup>

<sup>1</sup>Data in this row is from the 2009-2013 American Community Survey 5 year est. available at: <http://www.census.gov/newsroom/releases> Data was compiled by Health Systems Research

<sup>2</sup>Data in this row , except for the Target Community, is from the Illinois Monthly Labor Force Report, Illinois Department of Employment Securities, October 25, 2015 Report; Target Community Data is an estimate based on survey work within portions of the Targeted Community

Several pertinent indicators of the welfare and economic challenges within the Targeted Community are shown in the above table. First, it is important to note that these indicators are even more dramatic when compared to the State and National figures which are very close than to the City of Rockford. Unemployment, poverty, percent minority and never finished high school are all 50% to 100 % higher than the City of Rockford as a whole **but 2, 3 or more times higher than the Illinois or National figures**. The poverty rate is the most striking at 95% higher than the City rate and 441% higher than the National rate. In addition, there are several other indicators of the concentration of sensitive populations within the Targeted Community. In the Targeted Community 19.71% of the households are single parent female households compared to only 12.26% in the City as a whole and 51.7% of the households have public assistance income during the past year compared to 25.7% in the City as a whole. There is also a concentration of children in the Targeted Community, with a 19.73% figure (15.02% City) for children under 10 and 7.63% (7.11% City) for children 10-14. The Targeted Community is also a predominantly renter-occupied area, with owner-occupied units accounting for only 31.76% of the occupied units compared to 56.07% in the City as a whole. The housing stock has

a median year built of 1945 compared to 1960 for the City as a whole. Five of the twelve Census Tracts in the Targeted Community have a housing stock from 1939 or earlier. This is particularly important to consider because lead-based paint was not banned until the late 1970's. These demographics clearly demonstrate the concentration of sensitive populations living in very old rental units. (US Census, American Community Survey, 2009-2013).

Unfortunately, the Targeted Community has a much higher amount of crime than the City as a whole, accounting for 34.6% of the Group A Offenses though the population is only 21.1% of the City total. Certain types of crimes are particularly troubling for the Targeted Community with Weapon Law Violations accounting for 65.2% of the City total, drug/ narcotic violations accounting for 58.5% of the City total and prostitution accounting for 54 % of the City total.

One additional indicator of the need to focus on the Targeted Community is population gain or loss. Not surprisingly, the Targeted Community has experienced a major decline in population since 1970, declining from 47,412 in 1970 to 32,225 in 2010 (32,062 for 2013). This was a 32% drop in population during the time that the City of Rockford grew from 147,370 to 152, 871, a 3.7% increase. More importantly, the Targeted Community accounted for almost one third of the City's population in 1970 (32.2%) but only 21.1 % of the City's population in 2010. This is a direct result of the numerous plant closings during this period and the resulting major decline in jobs and business activity in the Targeted Community. It is not surprising that there was only one grocery store in the entire Targeted Community until Save-A-Lot opened a store in the 1700 Block of West State Street earlier this year. This may not have happened if the City had not performed Phase I and Phase II ESA's on two former gas station sites using an earlier Petroleum Assessment Grant. A No Further Remediation Letter from the Illinois EPA was needed to secure this project. This demonstrates the need for these funds and the benefit of these funds—the western portion of the Targeted Community had been a food desert.

### iii Description of Brownfields

The Targeted Community( 12 Census Tracts: 10,11,12,13,21,25,26,27,28,29,31,32) includes a total of seven (7) Petroleum (site) Brownfield (PB) Corridors all located within the Targeted Community. These PB Corridors are as follows: **1) The West State Street Corridor** is original US Route 20 and it became Business US 20 once the Bypass was completed in 1966. A desktop Phase 1 in 2007 identified 53 potential petroleum Brownfield sites within this corridor. Only twelve of these sites have been fully assessed to this point, most located in the eastern section of the corridor. This corridor is 132 acres in size and is located within 2 of the Census Tracts comprising the Targeted Community, Census Tract 25 and 26 **2) The Auburn Street Corridor** is an older commercial corridor with several former gas station sites. It is crossed by the Canadian Pacific (former Milwaukee Road) rail line which has a former petroleum tank farm adjacent to the rail line, near , but north of, Auburn Street. This Corridor is 171 acres in size and is located in Census Tracts 31 and 32 **3) The Kilburn Avenue Corridor**, located in Census Tract 26 and 31, is 267 acres in size. It is an older commercial corridor that somewhat parallels the Canadian Pacific Rail Line mentioned above. Not only does it have several former gas station sites, including one that had been the site of a murder during the early 1980's, it also has a major auto salvage yard. **4) The Morgan Street Corridor**, 39 acres in size, includes former gas station sites and two small- scale former auto salvage yards located adjacent to Kent Creek near the confluence with the Rock River. This Corridor is located in Census Tract 28. **5) South Main Street Corridor** has several former gas stations and a former bulk oil terminal adjacent to the Canadian National Rail Line where it crosses South Main Street. This corridor is located in Census Tracts 27 and 28 **6) The Kishwaukee Street (Illinois 251) Corridor**, has several former gas station sites and three auto salvage yards , one of which is abandoned. This area includes Census Tracts 10-13 and 21. This is also a heavily industrialized area which had an extensive rail beltway and spur network. Bulk oil terminals are also

suspected in this area. **7) Downtown.** This area is defined as the area within a one-half mile radius of the Winnebago County Courthouse (300 West State Street) and within one-half mile radius of City Hall (425 East State Street). This elliptically shaped area, 874 acres in size, has had Phase I Environmental Site Assessments performed for 12 of the 100 former gas station sites identified in a Desktop Phase 1 during 2008. Former gas stations have been found on local streets as well as the expected locations on major streets. Before the mid 1960's, nearly 100% of all gas station sites within the City of Rockford were located within the 7 Brownfield Corridors identified above. The Targeted Community of neighborhoods surrounding these corridors also included nearly all of the industry within the City of Rockford until approximately this same time. Economic disinvestment hit the Targeted Community from both sides- loss of nearby industry and nearby commercial businesses.

iv. Cumulative Environmental Issues

For over 100 years, virtually all industry as well as nearly all gas stations and petroleum bulk terminals in Rockford were located within the Targeted Community in or near these seven Brownfield Corridors. In addition, there were coal-fired-power plants, coal gasification plants and active landfills all located within the Targeted Community. The coal fired power plants were located in the Downtown Brownfield Corridor. The coal gasification plants were also located in the Downtown Corridor. The Peoples Avenue Landfill is located in the Kishwaukee St (Ill. 251) Brownfield Corridor.

The Targeted Community has a high percentage of minority and low income residents and a lack of proximity to jobs, a job "desert", in an area where the residents once walked to work. Major areas had been determined to be "Food Deserts" by USDA. These factors coupled with the environmental issues clearly identify environmental justice concerns. The City needs to have the resources to attack these Brownfields and produce jobs and services for the community such as grocery stores and general merchandise. The City now has the Hazardous Substance Assessment Funds, but it sorely needs the Petroleum funds because the Targeted Community is affected by both types of Brownfields.

**b. Impacts on the Targeted Community**

\* Many of the health issues reported below for the Targeted Community appear to be linked to the Brownfield Corridors. The most significant example of the exposure to toxic substances within the Targeted Community is that there have been 12 City well closures within the Targeted Community. It is difficult to determine how long the residents in the Community were exposed to VOCs or, in the case of one well, Chromium, before the contaminants were detected and the wells were closed. Health indicators, however, show a population that has been negatively impacted by Brownfields.

\* Threats to health or welfare of sensitive population within the Targeted Community: The Health Statistics documented below show the disproportionate impact to the Targeted Community, the community that is subject to environmental exposures from Brownfields. The Demographic Information, presented previously, clearly shows a disproportionately higher percentage of these sensitive population groups in the Targeted Community. These indicators coupled with the health indicators clearly show the threats to health and welfare of the sensitive populations in the Targeted Community. Median income, poverty rate, single parent female households, children under 10, and children under 15 are among the sensitive populations that are more prevalent in the Targeted Community. Another disproportionate impact on the Targeted Community is the shortage of neighborhood parks. The Rockford Park District has determined that every resident should be within walking distance, one half mile with no barriers, from a neighborhood park. Although most of the Targeted Community meets that standard, Brownfields are often closer to the residential areas and may draw children there instead of to the parks. These Brownfield sites pose a serious potential health risk to children who may play there because they are closer and they may be attractive nuisances.

\* Disproportionate impacts on the targeted community including health disparities:

The cumulative effects of airborne pollution from the power plants and factories as well as the contaminated soil at the Brownfield sites are difficult to measure. However the USEPA Environmental Justice (EJVIEW) website, 2005 data, provides health indicators that showed higher health risks within the Targeted Community than in the City as a whole. Neurological Risk was at less than .1 per cent of the population for 41 of the 51 Census Tracts in the City of Rockford, but the Targeted Community had 8 of its 12 Census Tracts in the higher .1to .3 percent range. For Cancer Risk, 31 of the 51 City Census Tracts had a Cancer Risk of 30-50 per million. Of the 12 Census Tracts in the Targeted Community, 8 had a Cancer Risk in the 50-75 per million range and 3 of the remaining 4 Tracts had a Cancer Rate at the highest local level of 75-150 per million. Total Respiratory Risk was 2.5- 4 % for 45 of the 51 City Census Tracts. Five tracts in the Targeted Community had higher risk levels with 3 tracts in the 4-6% risk level and the other 2 tracts were at the 6-10% risk level. Clearly the Targeted Community and its sensitive population of young children demonstrate several serious health disparities that affect livability and quality of life in this area.

In addition, Winnebago County Health Department Statistics for blood lead testing in children show that the Targeted Community has much higher lead levels than the City as a whole. These figures are available for a two year period, 8-1-07 to 8-31-09 and for 11-18-2015. This data was gathered by Zip Codes and not available at the Census Tract level. This data shows higher incidences of elevated lead levels in the bloodstream for the US Postal Zip Codes that include the Targeted Community. Zip Codes 61101 - 61104 include the entire Targeted Community and showed 237 children or 4.5% of the 5,270 children initially tested had blood lead levels at 10 or more micrograms per deciliter. The County wide figures show that 290 of the 10,157 initially tested (2.9%) had high lead levels. If the 61101-61104 Zip Codes (Targeted Community) are not included, the entire county excluding these four zip codes has an incidence in the initial test of only 1.1%, 53 out of 4887 tested. This year, 144 out of the County total of 161 children with elevated blood levels were found within the Targeted Community.

The high incidence of elevated lead levels among the children of this four Zip Code area that includes the entire Targeted Community, coupled with the higher rates of cancer, respiratory illness and neurological disorders coupled with the socioeconomic and housing data clearly show that the Targeted Community is an area with health disparities due to environmental issues including an older housing stock where lead-based paint has not been abated. This housing stock is deteriorating due to disinvestment by the property owners while children are being exposed to peeling lead-based paint. This disinvestment in the housing stock is symptomatic of an area impacted by Brownfields.

**c. Financial Need**

i. Economic Conditions: The City of Rockford needs the Petroleum Assessment Grant funding for several specific reasons: First, FY 2011 Assessment Grants were closed out during the fall of 2013 leaving , only the very restricted Illinois EPA River Edge Funds until they were suspended on June 15, 2015. Second, the city was awarded a \$200,000 Community-wide Hazardous Substance Grant effective Oct 1, 2015 and the City will be selecting a consultant soon. However, the City has found that it is very important to also have Petroleum Assessment Funds available to be able to fully address these the Brownfields affecting the Targeted Community. Third) the October 2015, unemployment rate for the City is 8.3%, the highest unemployment of any community of over 30,000 populations in the State of Illinois. Local studies suggest that the unemployment rate in the Targeted Community is double the City rate, or more. The current unemployment levels are clearly more severe for the City of Rockford and the Targeted Community than the surrounding area as evidenced by the 6.8 % figure for the Rockford MSA, 5.3% for the State of Illinois, and 4.8% for the US. (Illinois Monthly Labor Force Report, Illinois Department of Employment Security; U.S. Department of Labor, Bureau of

Labor Statistics, Oct. 2015 data).The Targeted Community's high unemployment rate is one of many reasons why the assessment, cleanup and redevelopment of the Brownfields are so important to the future well-being of the Targeted Community. Local economic conditions have also been impacted by industrial decline and resulting decline in manufacturing jobs as well as two natural disasters, the 2006 and 2007 floods (500 year) that occurred in the Keith Creek basin resulting in the removal of over 100 homes and five businesses. Declining property values and revenues, due to the Great Recession, stagnant retail sales tax revenues, major bond issues for major capital investments and municipal budget pressures to fund public safety first responders and their pensions have all contributed to the City's serious need for additional funding for Brownfield Assessments.

## ii. Economic Effects of Brownfields

Income and poverty level indicators on page 2 all show that the Targeted Community has an economically disadvantaged population with several economic indicators showing poverty and economic distress levels at up to two times or higher than the levels for the City as a whole. Income levels are considerably lower than the City as a whole, over 44% lower. (American Communities Survey 2009-2013).It is no coincidence that the Targeted Community demonstrates such high levels of economic need. Each of these socioeconomic indicators strongly shows an economically disadvantaged population that is disproportionately minority in composition. The combination of the concentration of Brownfields, lack of nearby employment, lack of basic retail and other services, the aging housing stock, and general lack of investment by the private sector have resulted in a precipitous decline in the viability of these neighborhoods. During the past 30 years, building permit records show that there have been only a handful of new commercial developments within the entire Targeted Community that were not subsidized by the City in some way, such as TIF financing. In addition, most of the commercial developments that did take place are located on the periphery of the Targeted Community, the Save-A-Lot on West State being a new exception. Although this is largely due to the private sector generally avoiding economically distressed areas, the numerous Brownfield sites and their blighting influences are detrimental to private developers looking for suitable sites. (City of Rockford, Department of Community and Economic Development.) These trends will continue unless these Brownfields are assessed, cleaned and redeveloped. The Assessment Grant Program proposed in this application would be a major step in the redevelopment of the Brownfield areas to productive uses including providing employment, retail goods and services, new housing, park and open spaces and offices.

## **2. Project Description and Feasibility of Success**

### **a. Project Description, Project Timing and Site Selection**

i. Project Description: The City of Rockford proposes to perform Phase I Environmental Site Assessments at a minimum of 10 Petroleum Brownfield Sites. These Phase I ESAs will be performed as a pre-requisite to City of Rockford acquisition of Brownfield sites within the seven Brownfield Corridors identified on pages 3 and 4. Many of these Brownfield Corridors have had a recent detailed Corridor Plan prepared; the "South Main Revitalization Strategy" completed late in 2011 by the Lakota Group, includes Brownfield Corridors 4 and 5. Corridor improvements are now under construction by the Illinois DOT and will continue during 2016. The Kishwaukee Corridor Study, completed during 2010, includes Brownfield Corridor 6. The Auburn Street Corridor, Corridor 2, is a major part of the Auburn Street Corridor TIF creation, completed during February of 2014. Brownfield Corridor #1, West State Street, is in the second phase of corridor improvements by the Illinois Department of Transportation in compliance with the "Business US 20 West State Street Corridor Study" a plan with extensive neighborhood input completed during 2002. Also, most of the seven Petroleum "Corridors" have had a comprehensive Desktop Phase I performed, site prioritization determined, and/ or an

eligibility determination matrix prepared and approved by USEPA. As a result of these revitalization plans and initial assessment activities, conducting the Phase Is will not require extensive preliminary work in most cases. The City will be working with the Brownfields Redevelopment Advisory Committee to identify and recommend new sites starting in June of 2016, with current priority being review of the Hazardous Substance Brownfield Clusters under the new Assessment Grant. These recommendations will be brought to Public Meetings out in the community for community input prior to final selection by the City Administration. This process will be continued for the Petroleum Assessment Program once grants are announced in the spring of 2016. The City will emphasize potential assessments in Brownfield Corridors that have not had Phase I assessments in the past. Phase I ESA's will be conducted at a minimum of 10 sites following this site selection. Phase II Environmental Site Assessments will be performed at a minimum of 6 sites. At least 3 sites will be selected for Cleanup and Redevelopment, then enrolled in the Illinois EPA Site Remediation Program for potential Cleanup through the Cleanup Grant or Supplemental RLF Program. Much of the Phase II ESA work will likely take place in the West State Street Corridor and South Main Street Corridors in conjunction with the corridor improvements. These are important commercial corridors to the Targeted Community and redevelopment of these sites for local commercial uses. Funding will be focused on the Phase II work with a minimum of 50% of the funding allocated to Phase II work.

ii. Project Timing: The City will begin its procurement of environmental consultant(s) through its standard RFQ/RFP procurement process once the awards have been announced and the Work Plan has been finalized. Priorities for Petroleum Phase I ESA's will be identified with input from the Brownfield Redevelopment Advisory Group during early 2016 so the City is ready in advance of the awards. The main reason for this urgency is the fact that the second phase of the West State Street Corridor Improvements is in the early land acquisition step. There are known to be at least 20 former gas station sites within this second phase of the West State project, as determined by a 2007 Desk Top Phase 1 for the whole corridor. Many of these sites will need to be assessed during 2016 prior to City acquisition. A spreadsheet of the selected Brownfield sites will be prepared and maintained by the City and Consultant(s) and used as input to the Quarterly Reports and Acres. Following completion of the Phase Is, potential Phase II sites will be identified then selected and the Quality Assurance Program Plan (QAPP) and Health and Safety Plan (HASP) will be prepared and approved. The City will then track each site using the Spreadsheet as an important tracking tool. There is built up need for Assessment funding to provide sites for Cleanup Grant and Supplemental RLF Applications.

iii. Site Selection: City staff will conduct a bus tour of the seven Brownfield Corridors with the Brownfield Redevelopment Advisory Committee (BRAC) members, City staff, including the Capital Improvements Manager, and City Administration Members. Detailed maps and aerial photos of each Brownfield Corridor will be provided as well as known acquisition plans and redevelopment, especially for known capital improvements such as West State Street and South Main Street. The recommendations of the BRAC will be considered by the City Administration and City Council. The timing of the West State Street Corridor Improvements (Phase 2), the extensive land acquisition required for this specific project and the identification of key sites will be important considerations.

## **b. Task Description and Budget Table**

### **i. Task Descriptions**

#### **Task 1: Site Prioritization & Eligibility Determinations**

The City has identified seven Brownfield Corridors as part of this grant application. A listing of the properties in these areas will be compiled through the use of Winnebago County's Geographic Information System (WINGIS). This is information that is fully accessible by City staff. Funds are not

needed to identify sites. Our intent is to utilize the grant funds within this Task to prioritize the sites. The Brownfields Redevelopment Advisory Committee, which has been dormant for a few years, will meet in January of 2016 and will include the Aldermen representing the Targeted Community as well as area stakeholders and citizens. Although the initial meetings will be focused on the Brownfield Clusters identified in the new FY2016 Hazardous Substance Assessment Grant (BF-00E01527), this Committee will later provide valuable insight in the prioritization of the Petroleum sites. It is important to note that this Petroleum Assessment Grant is needed to “fill the gap” in the Assessment Program and enable the City to integrate the two Assessment Grants to establish a comprehensive approach to Brownfield site characterization, assessment, cleanup and redevelopment. The Targeted Community is the same for both Assessment Grants. Once the sites have been prioritized, the eligibility determination information will be gathered and submitted to USEPA for review. In the case of commingling of hazardous substances with petroleum, the Illinois EPA will be included. The Output will be a prioritized list of petroleum sites to accompany the hazardous substance sites.

#### **Task 2: Conduct Phase I Site Assessments – Individual Sites**

Once sites are prioritized, eligibility determinations have been completed and accepted, Phase I Environmental Site Assessment (ESA) will be conducted using ASTM E1527-13 standard. All Phase I ESAs will be prepared in accordance with the ASTM E1527-13 standard, which has been approved by USEPA as demonstrating that the All Appropriate Inquiry has been conducted. The City anticipates conducting ten (10) to fifteen (15) Phase I assessments with the Petroleum funds at an average cost of \$2,500 per site. The Output will be 10 plus Phase Is prior to City site acquisition.

#### **Task 3: Phase II Environmental Site Assessments**

The City anticipates conducting six (6) to nine (9) Phase II ESAs with the Petroleum funds based on the results of the Phase I ESAs. The Phase II ESAs will be the primary focus of this Assessment Grant with \$100,000 programmed in the Budget Table. The number of assessments conducted will, in part, depend upon the size of the selected properties and the nature and extent of the contamination involved. The three (3) following items must be completed by our contracted Brownfields consultant(s) prior to commencing with any Phase II ESA activities. First the contracted consultant must prepare and receive approval from EPA of a Quality Assurance Project Plan (QAPP), Health & Safety Plan (HASP), and the site-specific Sampling and Analysis Plan (SAP). The Phase II ESAs will be compliant with Illinois EPA Site Remediation Program (SRP) standards. The costs of Phase II ESAs vary widely. Overall Phase II ESA costs \$7,500 to \$45,000 per Petroleum site. Our intent would be to prepare the enrollment application and take the results of the Phase II ESA work and present that information in the form of a Work Plan with the application. The Work Plan will detail the investigative activities needed to define the lateral and vertical extent of the discovered contamination. It is important to note that some of the Phase II ESA's will stem from Phase I's conducted under the previous Assessment Grant. It should also be noted that Green Site Investigation and Cleanup Techniques derived from the ASTM E2893-13 (Standard Guide for Green Cleanups) will be encouraged. The Output will be 6 to 9 Phase II ESAs.

#### **Task 4: Prepare Remedial Action Plans (Cleanup Plans)**

Following the SRP enrollment (budgeted in this task) and the completion of the Site Investigation step as part of the SRP process, Remedial Objectives/Remedial Action Plans (ROR/RAP) will be prepared. We intend to prepare plans for the six (6) to nine (9) Phase II ESA properties, based on the number of sites requiring cleanup and the amount of funding remaining once we get to this step. This task also includes paying for IEPA project management fees for regulatory review and approval of plans submitted to the IEPA for review under the SRP. The IEPA voluntary cleanup programs are fee-for-service programs. Since all sites for which Phase II ESAs are conducted will be enrolled in the IEPA programs, oversight fees will accumulate beginning with the review of the proposed Phase II Assessment work plan. The Output will be 6 Remedial Action Plans at enrolled sites.



**Task 5: Community Involvement** The objective of this task is to inform the community as a whole and the Targeted Community of: a) the City's intent to conduct environmental assessment activities; b) community input concerning the site priorities for assessment activities and future redevelopment; c) the assessment results; and d) cleanup plans and redevelopment efforts. This Community Involvement is documented in detail in Section 3 Community Engagements and Partnerships and will include the BRAC. Supplies will include display boards, informational brochures and large prints. The Output will be a total of 6-12 Public Meetings per year for site selection, assessment results, cleanup plans and reports on cleanups in process.

#### **Task 6: Programmatic Activities**

As part of the grant process, the City will utilize City staff to prepare all quarterly grant reports, the semi-annual MBE/WBE reports and the annual financial reports. . We also intend to have 2 City staff attend 2 national Brownfields conferences including related travel, lodging and expenses.

#### ii. Budget Table

#### ***Petroleum Assessment Grant Proposal Budget***

<b>Budget Categories</b>	<b>Task 1:</b>	<b>Task 2: Phase I ESAs</b>	<b>Task 3: Phase II ESAs</b>	<b>Task 4: Cleanup Planning</b>	<b>Task 5: Community Involvement</b>	<b>Task 6: Program matic Activities</b>	<b>TOTAL</b>
<b>Personnel</b>							
<b>Fringe Bnfts.</b>							
<b>Travel<sup>1</sup></b>						\$ 3,000	<b>\$ 3,000</b>
<b>Equipment<sup>2</sup></b>							
<b>Supplies</b>					\$ 2,000		<b>\$ 2,000</b>
<b>Contractual<sup>3</sup></b>	\$ 7,500	\$ 27,000	\$100,500	\$ 40,000	\$ 5,000		<b>\$ 180,000</b>
<b>Other: IEPA SRP Fees</b>				\$ 15,000			<b>\$ 15,000</b>
<b>USEPA Grant Total</b>	<b>\$ 7,500</b>	<b>\$ 27,000</b>	<b>\$100,500</b>	<b>\$ 55,000</b>	<b>\$ 7,000</b>	<b>\$ 3,000</b>	<b>\$ 200,000</b>

**c. Ability to Leverage:** The Community Wide Petroleum Assessment Grant is extremely important to the City of Rockford to identify sites needing soil and groundwater cleanup so the City can pursue Cleanup Grants and/or Supplemental RLF Funds to provide some clean sites for Brownfield Redevelopment that would benefit the residents of the Targeted Community. The City has recently used TIF funds to leverage the development of a Save-A-Lot in the 1700 block of West State in Census Tract 32. The City had acquired some of the property to form the site and had performed environmental site assessments. This area of the Targeted Community had been a food desert for more than 25 years. For the major indoor sports facility project, the City has approved a General Obligation Bond of over \$12 million for this project and leveraged over \$8 million in State of Illinois funding. The UW Health Sports Factory will open in May of 2016 and provide a major indoor sports facility for the City's youth, including the youth of the Targeted Community, during the week and youth sports tournaments on the weekend. These projects demonstrate the City's leveraging ability.

#### **3. Community Engagement and Partnerships**

**a. Plan for Involving the Targeted Community and other Stakeholders; and Communicating Project Progress:**

i. Community Involvement Plan: Rockford understands the importance of involving the community in Brownfield redevelopment. The City of Rockford has been actively involved in the community in its Brownfield initiatives. Wayne Dust, local Brownfield Coordinator and Planning Administrator for the City of Rockford, has presented an overview of the City's intent to apply for USEPA Brownfield Grants and has provided status reports for all assessment and cleanup projects on a regular basis at the Fifth Ward meetings throughout the last five years at the Montague Branch Library and at Public Meetings just prior to City Council or City Council Committee meetings. It is important to note that the City of Rockford increased the Transparency of its decision-making process starting in January of 2015 with the following major enhancements: 1) all staff reports to be presented to the Council or Committee are posted on the City's website on the Thursday prior to City Council or Committee meeting and 2) all Council Committee meetings as well as City Council Meetings are conducted in City Council Chambers and Broadcast Live on the local cable channel.

In addition to the efforts in the Fifth Ward, which has 3 of the 7 Petroleum Brownfield Corridors, the Brownfields Coordinator has worked with other Aldermen whose wards have Brownfields issues including Tom McNamara (Third Ward) Ann Thompson-Kelly (Seventh Ward) and Linda McNeely. (Thirteenth Ward). It should also be noted that the Third Ward and Thirteenth Ward each include two (2) of the Petroleum Brownfield Corridors. Mr. Dust will also work with other Aldermen where a major portion of one of the Brownfield Corridors is found. The Ward Meetings conducted by these Aldermen will be used as a venue to inform these communities of these programs and identify potential redevelopment projects. It is important to note that neighborhood organizations, business organizations, lenders, realtors, developers, residents and property owners are regular participants at these Ward meetings. The Brownfields Redevelopment Advisory Committee (BRAC) will soon form. The formation of this committee had been delayed by several factors including the sudden loss of the \$800,000 IEPA River Edge Grant in June of 2015, the struggle to replace this funding and three major Cleanup projects that needed to be completed during 2015. The City will soon form the BRAC and will be selecting an environmental consultant for the new Hazardous Substance Assessment Grant.

ii. Communicating Progress: The City will also increase its efforts to use its website to inform the community of its Brownfield Assessment and Cleanup Projects and their status. Monthly updates will be performed. Another form of public engagement that will be used will be workshops conducted throughout the Community in conjunction with the update of the City's Comprehensive Plan, the 2020 Plan. This Community outreach is currently ongoing.

**b. Partnerships with Government Agencies**

i. Local/State Environmental Authority: Illinois EPA: the Illinois EPA Voluntary Site Remediation Program (VSRP) works in conjunction with USEPA Region 5 to provide Cleanup Oversight for all sites enrolled in the VSRP. Successful completion of a site Cleanup or demonstration, through Phase II ESA reporting, that no contamination exists will result in a No Further Remediation Letter. In Illinois, receiving this NFR letter is a prerequisite to Brownfield Redevelopment.

ii. Other Governmental Partnerships: The City is actively developing partnerships for Brownfield redevelopment projects at the local, state, and Federal levels. At the Federal Level, the US EDA selected the City of Rockford for the ***Strong Cities, Strong Communities Initiative***. Under this initiative, two Federal employees had moved into offices in the City Hall to provide assistance to the City in seeking Federal Grants for economic development initiatives. At the local level, the City frequently partners with the **Rockford Park District** on Brownfield Redevelopment for parks and recreational facilities. The Rockford Park District is a separate regional taxing district with an elected

governing board. The District has been a long term Community Partner with the City and has coordinated planning efforts for several decades. An important example is the Intergovernmental Agreement between the City of Rockford and the Rockford Park District concerning the funding and operation of the UW Health Sports Factory at Ingersoll, a \$24 million dollar project that includes \$1.5 million in USEPA RLF Funding. The **Rockford Metropolitan Agency for Planning (RMAP)** is the Metropolitan Planning Organization for the Rockford Metropolitan Area under the supervision of the Federal Transportation Administration. RMAP has partnered with the City of Rockford specifically in the development of a new Amtrak Station, originally proposed at the site of the previous station where service had been terminated in 1982. This Depot Site and the adjacent Lorden site were acquired by the City of Rockford in September of 2010 from the Canadian National Railroad. The City received USEPA Cleanup Grants for these two adjacent sites and has recently completed these Cleanups, though the future Amtrak site has since been moved to the Union Pacific Site to the north. Although funding for Amtrak service is now on hold, RMAP will continue its efforts to secure future funding. RMAP has also provided certification for consistency of this grant application with the Livability Principles of the Sustainable Communities Planning and Implementation.

**c. Partnerships with Community Organizations**

**i. Community Organization Description and Role**

The following is a summary table describing the Community Organizations that the City is partnering with and their role in the planning and implementation of the City's redevelopment and repurposing of Brownfield sites:

<b>Community Organization</b>	<b>Description of Community Partnership</b>	<b>Level of Commitment: Formal Agreements</b>	<b>Contact Person, Title Phone</b>
Rockford Local Development Corporation RLDC	Subsidiary is Loan Recipient for 3 major RLF projects, \$2 million total	Several Development Agreements, wide range of programs/projects	John Phelps, Executive Director, 815-987-8675
Neighborhood Network	Community Action Gardens in Targeted Community	City Human Services Department Funding through Annual Budget	Cyndie Hall 815-967-4034
United Way, Rock River Valley	Will Partner with City on Job Creation in 2 neighborhoods	Inter-Agency Agreement with City being developed	Paul Logli, Executive Director 815-968-5400
Natural Land Institute	Riverfront Brownfields to restored naturalized areas	Agreement with City to be developed	Kerry Leigh 815-964-6666
Transform Rockford	Partner with Redevelopment Strategies	Informal meetings with City admin. and staff	Patrick O'Keefe 815-977-5840
Rockford Housing Authority	Will Partner with City on Job Creation in 2 neighborhoods	Inter-Agency Agreement with City for Police	Ron Clewer Executive Director 815-489-8500
River District	Assist with site selection and prioritization	Annual Funding for Staff Assistance by City	Gary Anderson 815-963-1900
Economic Development District of Northern Illinois	Partner with City on ED strategies, Brownfield site selection	Funding pass through from RAEDC	Dana Northcott, Executive Director 815-969-4252
Rockford Area Economic Development Council (RAEDC)	Assist with finding users for redevelopment of vacant industrial sites	Major Funding from City's Annual Budget; refinements ongoing	Mike Nichols, President 815-987-8129

ii. Letters of Commitment: Letters of commitment are attached from each of the Community Organizations listed above in Attachment d.

**4. Project Benefits**

**a. Health and/or Welfare and Environmental Benefits**

i. Health and/ or Welfare Benefits: The Seven Petroleum Brownfield (PB) Corridors have portions of the Rock River, Kent Creek or Keith Creek within their boundaries. In addition, they are all located in proximity to Downtown. The City of Rockford/ Rockford Park District share a plan for a continuous system of Greenways/Pathways along the Rock River and major creeks while linking with the major regional pathway system including the Grand Illinois Trail. Each of these PB Corridors has a redevelopment plan that includes job creation or major commercial and residential developments that include a focus on walking, non-motorized transportation, and in bad weather, public transportation, as the primary means of transportation to work or for recreation. This focus on creating several development nodes that encourage non- motorized transportation as part of this lifestyle is an important means of promoting personal health and preventing pollution. In addition, the Greenways Plan includes converting one of the three (3) railroad trestles across the Rock River to a pedestrian bridge linking the recreation paths on either side of the river that will be located within the Downtown. The City of Rockford now has ownership of this bridge, the former Milwaukee Road RR Bridge, and will convert this bridge to pedestrian use during 2016.

There will be welfare and public health benefits as the environmental assessments are taken to the site cleanup stages and beyond, both from the safe removal of the hazardous substances as these Brownfields are cleaned up and from the standpoint that the open space components and pathway extensions incorporated into the redevelopment plans for each PB Corridor will promote a healthier lifestyle. Children will soon be able to play in new parks that are currently Brownfields. This healthy lifestyle will replace the air pollution, contaminated soil and groundwater impacts noted in the “Community Need” section at these locations and other sites as they are brought through the assessment cleanup and repurposing process .It is important to note that the UW Health Sports Factory at Ingersoll, the Downtown Motel and Convention Center at Amerock and the Amtrak Station at Tapco are all being interconnected with pedestrian improvements including widening of the pedestrian walkway across the Chestnut Street Bridge providing a maximum walking distance of two blocks. As noted above, the rail road bridge across the Rock River will be converted to pedestrian use. This will provide an alternative 4-block scenic route from the future Downtown Hotel to the UW Health Sports Factory with views of the other two railroad bridges, the Fordham Dam and the original ford of the Rock River from which Rockford was named.

**ii. Environmental Benefits**

The City of Rockford has an exemplary record of following through with the redevelopment of Brownfields that were originally the site of environmental assessments performed using the USEPA Assessment Grant. There have been extensive environmental benefits as a result of these efforts that started with the assessment program, were continued with USEPA Cleanup Grants , USEPA RLF Program Funds, State of Illinois Grants and General Obligation Bonds. Three interrelated project sites have gone through this process and will be online starting with the Sports Factory starting in the spring of 2016. The Downtown Hotel and Convention Center at Amerock and the Amtrak Station /support facilities at Tapco are anticipated to be complete during 2018. These three projects total upwards of \$95 million in investment and they would not have been possible without the USEPA Assessment Grants. These projects will have numerous health, welfare, employment and economic benefits. They are also providing considerable Environmental Benefits including the following: 1)reduction in emissions due to the encouragement of pedestrian movement between the three anchor projects (the “park your car once and walk” parking management technique is imperative); 2) removal

of considerable contamination at two of the sites preventing further contamination from reaching the Rock River and 3) soil and groundwater cleanup and the establishment of engineered barriers to prevent exposure to people using the three facilities and the connecting routes. Item 2 is particularly noteworthy because the City of Rockford has a particular incentive to improve the water quality in the Rock River because it has become a year-round habitat for a local Bald Eagle population which has been increasing over time. The Rock River just below the Fordham Dam is a major feeding grounds for the local Bald Eagle population, many of which roost along the Rock River to the south of the Fordham Dam. Some of these roosting sites are Brownfields, such as Barber Colman.

## **b. Environmental Benefits from Infrastructure Reuse/ Sustainable Reuse**

### **i. Policies, Planning and Other Tools**

The City of Rockford is committed to promoting sustainable development, especially mixed use development that encourages live, work and play environments which focus on non-motorized transportation. The UW Health Sports Factory at Ingersoll is a good example of infrastructure reuse of a large vacant industrial structure that will not only become an indoor sports complex for local youth, but also be a LEED Certified Building combining energy efficiency and reduction in emissions. The Cleanup of the site has already prevented petroleum product from entering the adjacent Rock River and eliminated exposure routes from contaminated soil. Another major component of the infrastructure reuse at Ingersoll will be a walkway along the Rock River, which is an important part of the local infrastructure (State right-of-way). Although Ingersoll is a good example, all proposed redevelopments within the Brownfield Corridors will incorporate the following infrastructure reuse/sustainable reuse principles: LEED Certified Buildings (either new construction or adaptive reuse), restoration of native landscaping and storm water management and reuse innovations, especially the ability to incorporate surface water quality improvements. Brownfield Redevelopment is also a very effective tool in reversing sprawl, a significant sustainability-related problem that negatively impacted the City as documented in the City's 2020 Comprehensive Plan.

ii. Integrating Equitable Development or Livability Principles: the creation of live, work and play environments though promoting mixed-use developments within Brownfield Redevelopment Strategies has already been noted. One particularly good example here is the proposed redevelopment of the Amerock Building, Ingersoll Building and Tapco site. When these 3 developments are completed in 2016-18, the City will have a major Indoor Sports Complex, a major Downtown Hotel and an Amtrak Station. These developments will be interconnected by two pedestrian links across the Rock River. Another good example is the Save-A-Lot Grocery on West State St. in the Ellis Heights Neighborhood of the Targeted Community. After 25 years of being located in a food desert, the surrounding residential neighborhood now has a grocery store that can be walked to. A previous Petroleum Assessment Grant laid the groundwork for this grocery store, a basic service needed by this neighborhood that also provides jobs in the neighborhood because of the City's TIF policies.

### **c. Economic and Community Benefits (long-term benefits):**

i) Economic or Other Benefits: This important goal will be accomplished by the City's efforts in the seven Brownfield Corridors. Without the City's concern for the redevelopment of Brownfields and the USEPA programs to assist with these redevelopment efforts, there is considerable evidence that Brownfield Corridors would simply expand and intensify over time as more and more buildings and sites approach the end of their useful life. Instead, many buildings and sites have been acquired by the City or other public or private entities that have been working with the City of Rockford towards the phased redevelopment of these areas. Each Brownfield Corridor has a different potential. The Downtown, for example, because of the eminent development of the UW Health Sports Factory at the Ingersoll, has potential for complementary development on nearby Brownfields and the enhanced property values and job creation due to increased tourism activity, restaurants, and other retailers. A nearby Brownfield site, the 13 story, 220,000 square foot City-owned Amerock Building will become

a Hotel and Convention Center. There was no interest in this Building before the Indoor Sports Center (recently named the UW Health Sports Factory) was announced. Now the City has a comprehensive Development Agreement with Gorman and Company for capital improvements and funding. Similar comprehensive plans are in place or being developed at all of the 7 Brownfield Corridors. All these plans replace Brownfield properties with residences, retailers, offices, and public open space amenities/ destination points, all of which contribute to the tax base directly or indirectly as these areas are revitalized. All include retail services for the surrounding community and job creation.

ii Job Creation Potential : Partnerships with Workforce Development Programs Planned efforts to promote local hiring and procurement; the City of Rockford, through its Tax Increment Financing (TIF) Districts has implemented a policy of increased funding by the City if the development agreement includes a requirement for new hires to be from within the TIF District and the surrounding community. The Targeted Community includes 14 TIF Districts currently and includes all 7 of the Petroleum Brownfield Corridors, so the implementation of this policy has been beneficial to the City's Brownfield Program overall and compliments this Assessment Grant. The City of Rockford partners with the Workforce Connection, an Illinois "workNetcenter" whose partners also include several State of Illinois Departments and other agencies. The City will be partnering with Rock Valley College to apply for Brownfields Job Training Grant this January.

## **5. Programmatic Capability and Past Performance**

**a. Programmatic Capability:** The Brownfields Program Management System in place at the City of Rockford consists of the Planning Administrator, Wayne Dust, and support staff in both the Community and Economic Development Department (CED) and the Finance Department. Wayne Dust is the designated Brownfields Coordinator by USEPA Region 5 since 2003. Mr. Dust has a Master's Degree in Geography from Kent State University and over 41 years of City Planning experience, 33 years of which have been with the City of Rockford. He is a member of the American Institute of Certified Planners (AICP). As the Brownfields Coordinator, he manages the USEPA Brownfields Grants as well as the environmental consultants under contract with the City for the Brownfields Program. Wayne prepares the Quarterly Reports for each grant, maintains the spreadsheets, reviews the technical reports and invoices prepared by the environmental consultants and cleanup contractors, coordinates with the City Administration and other Departments, and communicates with the Aldermen and representatives of the Brownfield-impacted communities.

The support staff in the CED for the Brownfields Program will be David Sydney and Susan Diehl. Susan Diehl, Administrative Assistant to the CED Director, has a degree in Computer Science and 8 years of experience in payroll, accounts payable and general office administration. Ms. Diehl handles all payments to the environmental consulting firms under contract with the City of Rockford, and coordinates with Steve Stromquist of the Finance Department who performs the drawdowns from USEPA. MS Diehl also maintains and updates the CED Department Webpage including the Brownfields Section. It should be noted that the City's Website is translated into over 40 languages by Google, so the Hispanic Community has quick access to the Brownfield Community. David Sydney has a Master's Degree in Planning from the University of Illinois and has 6 years of experience in Planning and Design in the private sector before coming to the City in August of 2013. David will assist with planning and design of Brownfield sites including adaptive reuse of any existing structures. The City currently has Fehr-Graham and Associates under contract to perform environmental assessment work under contract to perform Cleanup Oversight in conjunction with the current USEPA Cleanup Grant Programs at the Lorden/Eclipse and Depot sites, USEPA Cooperative Agreements BF00E01077 and BF00E01078 and for the Ingersoll Site Asbestos Removal and Engineered Barrier under the RLF Program (BF-00E45801-5). Please note that Fehr-Graham had

performed the Phase I and Phase II Environmental Site Assessments for these sites and had prepared the approved Remedial Action Plans. In the event that the City of Rockford receives an FY2017 Assessment Grant, the City of Rockford will secure the needed environmental services through the City's Procurement Process.

**b. Audit Findings:** There has been only one (1) minor adverse finding from the July 26, 2006 OMB Circular A-133 Audit performed by Mc Gladrey and Pullen for 2005, Finding 2005-7. This finding was concerning late reports. This issue was immediately addressed and there have been no adverse findings since that point in time.

**c. Past Performance and Accomplishments**

**i. Has a Current USEPA Grant and has Received USEPA Grants:** The City of Rockford recently received a Hazardous Substance Brownfield Assessment Grant for FY2016-Fy2019, BF-00E01527. The Revolving Loan Fund Grant received additional funding for FY 2016 and several new Brownfield Cleanup projects have been identified to use these funds. Two Cleanup Grants, BF-00E1077 and 78 are nearing completion and will be closed out during the second quarter of FY 2016.

1. Compliance with Grant Requirements: Each of the first three grants listed below has complied with Grant Requirements and has been closed out. Cooperative Agreement numbers are provided.

2. Accomplishments are summarized below for each of these grants:

Grant Description	Amount	Accomplishments: Assessments or CA Number	Accomplishments: Cleanup or CA Number	Redevelopment Project?/ NFR Letters
<i>Community Wide Assessment</i>	<i>\$400,000</i>	<i>14 phase I ESA's 6 Phase II ESA's</i>	<i>CA BF-00E00435</i>	<i>5 No Further Remediation Letters</i>
Cleanup Grant: Haz. and Petroleum	\$200,000	CA BF-00E00320	Draft NFR Letter (5 acre site)	\$24 Million Indoor Sports Complex
Cleanup Grant: Hazardous Subst.	\$200,000	CA BF- 00E00079	1 No Further Remediation Letter (.6 acre)	Future Amtrak Station Development. <sup>2</sup>
RLF Cleanup Grant: Petroleum	1,000,000	CA BF 00E45801-5	\$1,000,000 programmed to Ingersoll	\$24,000,000 Indoor Sports Complex; 70% complete
RLF Cleanup Grant Hazardous Subst.	\$1,050,000	CA BF 00E45801-5	\$700,000 to Tapco; \$450,000 to Ingersoll	\$24 Million Indoor Sports Complex; Future Amtrak Station

<sup>1</sup> Also included the demolition of two structures to complete soil and groundwater sampling

<sup>2</sup> The Indoor Sports Complex at Ingersoll is a \$24 million dollar project with a \$12 million general obligation bond from the City; project is 70% complete as of 12/15/2015; will open May of 2016. Originally the Amtrak station was planned for another site but was moved to the Tapco Site. Other leveraged funds included the Illinois EPA River Edge Program, the Illinois DCEO River Edge Program, IKE Disaster Recovery Funds and the USEPA Cleanup Grant (FY2013).

